

Message

From: Lisa Rector [lrector@nescaum.org]
Sent: 8/17/2020 11:29:26 AM
To: Johnson, Steffan [johnson.steffan@epa.gov]
CC: Brashear, Angelina [Brashear.Angelina@epa.gov]; Toney, Mike [Toney.Mike@epa.gov]
Subject: RE: ASTM 2779 and the NSPS

Thanks Stef. Your email confirms what I originally thought, but because it also references ASTM 2780, which is what triggered the question. Does this mean that using Doug Fir for cribs tests is also a may rather than a shall?

From: Johnson, Steffan <johnson.steffan@epa.gov>
Sent: Monday, August 17, 2020 7:22 AM
To: Lisa Rector <lrector@nescaum.org>
CC: Brashear, Angelina <Brashear.Angelina@epa.gov>; Toney, Mike <Toney.Mike@epa.gov>
Subject: RE: ASTM 2779 and the NSPS

Hi Lisa,

Use of the word "may" or "should" in EPA regulations always indicates that the described statement is optional and not mandatory.

If Douglas fir pellets were mandatory, the regulation would have used "shall" or "must".

Thank you,

Stef

From: Lisa Rector <lrector@nescaum.org>
Sent: Sunday, August 16, 2020 3:08 PM
To: Johnson, Steffan <johnson.steffan@epa.gov>
Subject: ASTM 2779 and the NSPS

Stef 60.534 states that (f) Douglas fir may be used in ASTM E2779-10, ASTM E2780-10 and CSA B415.1-10 (IBR, see § 60.17). Does that mean that all ASTM 2779 testing should use Douglas Fir pellets?



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